

The Delta Protection Commission's Proposal to Protect the Delta as an Evolving Place

Requested Action: Staff recommends that the Council review the Delta Protection Commission's (DPC) *Proposal to Protect the Delta as an Evolving Place*, take public comment on the proposal, and provide direction about recommendations from the Commission's proposal that ought to be considered for incorporation in the Delta Plan.

Initial analysis suggests DPC's proposed National Heritage Area nomination and 24 of DPC's 38 policy recommendations appear feasible and consistent with the Delta Reform Act, three are potentially consistent, three are premature, and eight recommendations appear inconsistent or infeasible.

Background

The Delta Reform Act, in Water Code Sec 85301 (a) and (b), requires that the Delta Protection Commission (DPC) develop and submit to the Delta Stewardship Council, for consideration and possible incorporation into the Delta Plan, a proposal to protect, enhance, and sustain the unique cultural, historical, recreational, agricultural, and economic values of the Delta as an evolving place, in a manner consistent with the coequal goals. The proposal is to include:

- A plan to establish state and federal designation of the Delta as a place of special significance, including potential application for a federal designation of the Delta as a National Heritage Area.
- A regional economic sustainability plan to support increased investment in agriculture, recreation, tourism, and other resilient land uses in the Delta, including detailed recommendations for administration of the Delta Investment Fund created by the Delta Reform Act's Public Resources Code 29778.5.

In Public Resource Code 29759, the Delta Reform Act provides that the economic sustainability plan shall include:

- Public safety recommendations, such as flood protection recommendations.
- The economic goals, policies, and objectives of local general plans, and other local economic efforts, including recommendations on socioeconomic sustainability of agriculture and its infrastructure and legacy communities in the Delta.
- Comments and recommendations to the Department of Water Resources concerning its periodic update of the flood management plan for the Delta.
- Identification of ways to encourage recreational investment along key river corridors, as appropriate.

The DPC's proposal is intended to inform the Council as it deliberates about how the Delta Plan can achieve the coequal goals of improving water supply reliability and restoring the Delta ecosystem 'in a manner that protects the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place' in conformance with Water Code Section 85054. The Delta Reform Act provides that the DPC "is the appropriate agency to identify and provide recommendations to the Delta Stewardship Council on methods of preserving the Delta as an evolving place" because it is "an existing forum for Delta residents to engage in decisions regarding actions to recognize and enhance the unique cultural, recreational, and agricultural resources of the Delta" (Public Resources Code Sec 29703.5(a)).

Two state agencies submitted reports to assist DPC in preparation of its proposal, as the Delta Reform Act requires in Water Code Section 85301(c):

- California State Parks submitted its *Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh* to expand the network of state recreation areas within the Delta.
- The Department of Food and Agriculture submitted a report by the University of California Davis' Agricultural Issues Center, *Evaluation of Policy Alternatives to Benefit Agriculture in the Sacramento-San Joaquin Delta of California*, to fulfill its responsibility to propose market incentives and infrastructure to protect and enhance the economic and public values of Delta agriculture.

The Delta Protection Commission's Proposal

DPC submitted its proposal for protecting the Delta as an evolving place to the Council on January 27, following the Commission's final action on its *Economic Sustainability Plan* the previous evening. The proposal includes both elements required by the Delta Reform Act -- a plan to establish a state and federal designation of the Delta as a place of special significance and the economic sustainability plan.

Designating the Delta as a place of special significance. The proposal to designate the Delta as a place of special significance is DPC's draft nomination of the Delta as a National Heritage Area (NHA). A NHA is a place designated by the United States Congress where natural, cultural, historic and recreational resources combine to form a cohesive, nationally-distinctive landscape and tell a nationally important story about the country and its experience. Designation comes with limited financial and technical assistance from the National Park Service.

The DPC's proposal recommends seeking designation as a NHA to 'recognize, enhance, and promote 'Delta-as-a-Place' to help cultivate and retain appreciation and understanding of the Delta as an ecological, agricultural, recreational, historical, and cultural treasure.' DPC recommends the NHA include the legal Delta and Suisun Marsh as well as adjoining areas in Rio Vista and the Carquinez Strait. DPC selected the NHA as the best choice for designating the Delta as a place of special significance after examining several other alternatives, including a state designated Delta heritage corridor, a locally designated Delta Heritage Area, and continuation of current practices.

The proposed NHA's vision is 'a regional network of partner sites, with interpretive/educational components, that will be linked where possible and serve as the primary attractions, on existing public properties or on private properties with the voluntary consent and involvement of the landowners.' The NHA's goals are to 'brand the Delta as a region of national significance to educate the public about 'Delta-as-a-Place', and build more support for preserving, protecting, and enhancing the Delta.' Other goals are related to economic development, public access, historic preservation, interpretation, and more. The NHA would reveal the region as an inland Delta at the heart of California, converted from marshland to farmland through one of the largest reclamation projects in the United States. It would provide information about the multi-cultural contributions and experiences that have shaped the Delta's rural landscape, its fertile agriculture, and its place at the center of California's water resource challenges. DPC concludes that designating the Delta as a NHA has the potential to contribute to the economic sustainability of the Delta; attract new visitors to the area; and expose local residents and visitors alike to the Delta's uniqueness, its contribution to California's history, and its wealth of recreational opportunities.

DPC's draft proposal to nominate the Delta as an NHA is not final. The draft is being reviewed for completeness by the National Park Service (NPS) over the next month, so that a final proposal responding to any NPS concerns can be presented to the Commission for adoption later this spring. If the DPC endorses the nomination, it will be submitted to the NPS for evaluation and recommendation to Congress.

Process

The proposal to designate the Delta as an NHA was prepared by DPC's staff. DPC held six workshops during the nomination's development, attended by 145 participants, and notified a mailing list of nearly 1500 about the proposal. Five comment letters and about eight responses to an on-line survey were submitted during the nomination's development. The nomination has been endorsed by state agencies, including California State Parks, the California Travel and Tourism Commission, the Office of Historic Preservation, and UC Davis' Small Farm Program, local governments, including the cities of West Sacramento and Rio Vista and Contra Costa, San Joaquin, and Sacramento counties, and an array of stakeholders as diverse as the Delta Chamber of Commerce, the Suisun Resource Conservation District, the Antioch Historical Society, the Recreational Boaters of California, Mokelumne Coast-to-Crest Trail Council, and the Bay Point Garden Club.

Planning for the Delta's economic sustainability. DPC's *Economic Sustainability Plan for the Sacramento-San Joaquin Delta* includes all the components required law. It includes information and recommendations about the economy of the legal Delta (but not Suisun Marsh), emphasizing the Delta's primary zone. To aid its analysis, it provides six scenarios of the Delta's future, influenced by alternatives under consideration in the Bay-Delta Conservation Plan:

- Baseline scenario in which water continues to be conveyed through Delta channels to the SWP and CVP's pumps, no habitat restoration occurs, all levees are upgraded to PL 84-99, and land use planning and regulation remain local governments' responsibilities, overseen by DPC in the primary zone, but without active involvement by the Delta Stewardship Council.
- Isolated conveyance scenario in which a 15,000 cfs tunnel conveys 5.4-5.9 MAF of water through Delta to the SWP and CVP's pumps, with potential deterioration of water quality in the central and south Delta.
- Habitat conservation scenario in which about 100,000 acres of crop land would be flooded in an expanded Yolo Bypass and restored San Joaquin River floodplains and tidal marshes, and grasslands and 32,000 acres of cropland would be preserved or managed for wildlife-friendly agriculture.
- Levee scenarios in which levee improvements depart from the PL 84-99 standard, either by not improving levees on some islands, so that six central Delta islands are inundated and not reclaimed, or by upgrading levees around the Delta's legacy communities to protect against a 100 year flood.
- Regulatory scenarios in which regulation under the Delta Plan increases, presumably making the Delta a less attractive place for investment.
- Delta Vision scenario in which the Delta is designated as a NHA, farm markets are expanded with special programs, and economic programs like enterprise zones and the Delta Investment Fund stimulate business and employment.

The *Economic Sustainability Plan* examines these alternatives' effects on the primary zone's economy and concludes that the baseline scenario, enhanced with 100 year flood protection for legacy communities and some features from the Delta Vision scenario, offers the best prospects for the Delta. It is preferred because DPC's analysis concludes it has less economic impact on agriculture and recreation/tourism in the primary zone and offers the best prospects for the legacy communities.

DPC's proposal recommends strategies and actions drawn from the *Economic Sustainability Plan* to address seven topics: levees and public safety, economic sustainability, recreation and tourism, infrastructure, habitat and ecosystem improvements, water supply reliability, and research and monitoring. Thirty eight specific recommendations are offered. Table 1 (attached) presents these recommendations.

The proposal also recommends that the Delta Investment Fund authorized in Public Resources Code Sec 29778.5 be used to further the development of the Delta as a place: supporting tourism, preserving unique cultural sites associated with legacy communities, and supporting infrastructure that encourages destination visits to the Delta. DPC suggests it should administer the Delta Investment Fund, advised by an investment committee appointed by the Commission and charged with developing a strategic plan to guide funding decisions.

Process

DPC's *Economic Sustainability Plan* was prepared by a consulting team led by the University of the Pacific's Dr. Jeffrey Michael working with engineers, land use planners, recreation specialists, and others. DPC created an Economic Sustainability Committee that held monthly public meetings, held nine public workshops that attracted about 175 attendees, hosted eight focus group meetings, and compiled a mailing list of 750 persons who were notified about the plan's development. It received 28 written comments on the plan.

- Comments from Delta residents emphasized promoting agriculture and improving flood protection. Local governments often supported the plan's recommendations, but sought additional documentation regarding key issues.
- A letter to the council from the Natural Resources Agency, Business and Transportation Agency, and Department of Food and Agriculture supported some of the ESP's recommendations, but criticized several other significant recommendations. They complained that its proposed levee improvements could be more expensive than the DPC's estimate and that the ESP does not adequately assess the cost-effectiveness of levee improvements. They also said the ESP emphasized preservation of the "status quo" without presenting a feasible plan or assessing its impacts. They also worry DPC's proposal will prevent implementation of potential Bay-Delta Conservation Plan alternatives. They criticized the ESP's assessments of agriculture's economic contributions to the Delta. The DPC's state agency members abstained from voting on the ESP's adoption. Other State agencies' comments on the ESP sought to clarify their roles and programs.
- Water contractors criticized the plan for its preference for preserving the status quo and asserted it overstated economic damages from isolated conveyance and habitat restoration and underestimated the cost of upgrading Delta levees.
- In response to comments from a Delta Science Program review panel, the report's recommendations were expanded to include suggestions about emergency response planning. Other observations of the review panel are noted below, where relevant.

Reviewing DPC's Proposal to Protect the Delta as a Place

Water Code Sec 85301(d) requires the Council to consider DPC's proposal. The Council may include portions of the proposal in the Delta Plan if, in its discretion, it determines it is feasible and consistent with the purposes of the Delta Reform Act and the Delta Plan's objectives. This memo provides background for Council discussion about which, if any, of the proposal's recommendations it may wish to consider for inclusion in the Delta Plan, focusing on the recommendations' feasibility and their consistency with the purposes of the Delta Reform Act and the Delta Plan's objectives. A definition of feasibility is provided in the California Environmental Quality Act (Public Resources Code 21061.1): capable of being accomplished in a successful manner in a

reasonable period of time, taking into account economic, social, environmental and technical factors.

In addition, the Council must review the economic sustainability plan for consistency with the Delta Plan within 180 days of its approval by the Commission (Public Resources Code 29761.5(b)). This review will be completed after the Delta Plan is adopted later in 2012.

Protecting the Delta as an Evolving Place Doesn't Stop Change

An inherent objective of the Delta Reform Act's co-equal goals is to protect and enhance the unique cultural, recreational, and agricultural values of the Delta as an evolving place (Water Code Section 85020(b)). The Delta Vision Report outlines principles underlying the concept of an "evolving place". These include accepting that change will not stop, but that the fundamental characteristics and values that contribute to the Delta's special qualities and that distinguish it from other places can be preserved and enhanced while accommodating these changes. Some changes – growing populations, shifting commodity markets, climate alteration, and rising sea levels, -- are beyond Delta residents' control. Some changes will be required to meet statewide goals of restoring the Delta's ecosystem and improving our water supplies' reliability, because the Delta cannot be sustained as we use it today. Other changes can be managed by policies that shape how the Delta's traditions are honored and its history preserved, where new development occurs, whether recreationists are welcomed, and what encouragement is provided for agriculture, business expansion and economic development.

Protecting the Delta as a place does not mean that the Delta should be a preserve, a museum, or a fortress. Rather, it encourages land uses and development that are resilient, adjust to changing conditions, and recover readily from distress. Protecting the Delta as an evolving place depends partly on sustaining its economic vitality, with the resources to respond to change, so that the Delta remains an attractive place to live, do business, and visit. The vision of the Delta as an evolving place also acknowledges Delta residents' role in shaping their region's future through active and effective participation in Delta planning and management.

Designation of the Delta as a Special Place

DPC's proposal to seek designation of the Delta as a National Heritage Area is consistent with the purposes of the Delta Reform Act and the Delta Plan's objectives. The Legislature has already declared that the Delta is a natural resource of statewide, national, and international significance (Public Resources Code 29701) and that the cities, towns, and settlements within the Delta are of significant historical, cultural, and economic value (Public Resources Code 29708). Designation of the Delta as a National Heritage Area was a strategy proposed in the Delta Vision report. California State Parks' *Recreation Proposal* recommends it too. Designation of the Delta as a National Heritage Area also has wide support among state and local agencies and many stakeholders. DPC's nomination of the Delta as a National Heritage Area is supported

by a feasibility study, prepared to National Park Service guidelines, that demonstrates that a National Heritage Area could be designated in a reasonable period of time and has many economic, social, and environmental benefits and no apparent disadvantages.

Economic Sustainability Plan

An initial evaluation of the Economic Sustainability Plan's recommendations' feasibility and their consistency with the purposes of the Delta Reform Act and the Delta Plan's objectives is presented in Table 1. Of the 38 recommendations, 24 appear feasible and consistent with the Delta Reform Act. At the direction of the Council, staff will evaluate these recommendations with respect to potential EIR implications over the coming weeks. The Council's staff may recommend including them in the plan, perhaps with minor modifications to clarify terms or align their structure with other plan recommendations. These include recommendations about emergency response planning, some agriculture recommendations, recommendations about recreation, tourism and infrastructure, a few recommendations about habitat and ecosystem improvements and water supply reliability, and research and monitoring recommendations. Further discussion with the DPC is needed to assess whether three other recommendations are suitable for inclusion in the Delta Plan with some modification. These include the recommendation to assign some responsibilities to a regional flood management agency, consistent land use planning, and cost-benefit analysis.

Three recommendations appear premature. They anticipate recommendations of the Bay-Delta Conservation Plan (BDCP) about through-Delta conveyance, an isolated conveyance facility's capacity, and habitat restoration projects' economic effects. Rather than including them in the Delta Plan or rejecting them now, these should be referred for consideration by the agencies developing the BDCP. The Council may want to reconsider them again if the BDCP is incorporated in the Delta Plan as provided in Water Code Sec 85320 to assess whether they are still relevant, feasible, and consistent with the Delta Plan.

Eight recommendations appear inconsistent with the Delta Reform Act and the objectives of the Delta Plan. Proposals to upgrade all levees to uniform PL 84-99 standard and to further improve most rural levees and selected other levees to higher standards is not consistent with the Delta Reform Act's requirement that the Delta Plan establish priorities for levee improvement (Water Code section 85305(a)). In addition, there is significant disagreement about whether improvements to meet these standards are feasible. Comments of the Natural Resources and Business and Transportation agencies and Department of Food and Agriculture say that "the ESP does include economic analysis to support their recommendations regarding comprehensive Delta levee improvements. Both DWR and the Delta Science Program's independent review panel have criticized the Economic Sustainability Plan for underestimating these improvements' costs. The significant potential for cost overruns, the lack of economic justification, and the uncertainty about a long term fund source for these improvements

suggests that it may not be implemented in a reasonable period of time when economic factors are taken into account.

In addition, the recommendation that additional funding be provided for levee maintenance may also be economically infeasible given other demands for the limited State funds available for Delta programs and the fundamental responsibility of local reclamation districts for maintenance of non-project levees. The Legislature has found in the Delta Reform Act that “property ownership in the Delta continues to depend on landowners’ maintenance of ... non-project levees, and does not include any right to state funding of levee maintenance and repair” (Water Code 85003b). The Act provides that flood protection should rely on structural and nonstructural means to ensure increased public safety (Public Resources Code Section 29702), rather than relying primarily on levees as recommended is the DPC’s proposal.

Several recommendations about habitat restoration and related recommendations about mitigating economic impacts and maintaining and enhancing the value of Delta agriculture are also inconsistent with the Delta Reform Act. Current biological opinions about protecting threatened and endangered fish and the *CALFED Ecosystem Restoration Program Plan (Vol II)* are urgent and consistent in their call for restoration of significant acreage of tidal wetlands in the Delta. DPC’s recommendation that tidal marsh habitat plans should be significantly reduced would be contrary to the goal of restoring the Delta ecosystem. Restoration of these tidal marshes may unavoidably result in some reduction in the value of Delta agriculture, contrary to DPC’s recommendation. The Natural Resources and Business and Transportation agencies and the Department of Food and Agriculture have advised against including this provision, which the 5th staff draft Delta Plan had suggested as a performance measure.

The feasibility of DPC’s recommendation to avoid increasing open-water habitat may depend on the outcome of plans to upgrade Delta levees. Prior studies indicate that, if levees fail, reclamation of some islands may not be cost effective. Because of the uncertainty about implementing DPC’s recommendation to upgrade all Delta levees, avoiding some increase in open-water habitat may be unavoidable in the event of an earthquake, flood, or other major levee failure. Analyses by the Public Policy Institute of California suggest that it is likely that many islands could not be cost effectively reclaimed if they were to fail in an earthquake or flood. The Delta Science Program’s review panel recommended that plans should be made for flooding islands whose levees are not needed to provide a reliable water supply or restore the ecosystem, rather than leave those decisions to be dealt with after an unplanned levee failure.

Two other DPC provisions affecting water conveyance or ecosystem restoration projects are also inconsistent with the Delta Reform Act and of questionable feasibility. One provides that restoration start on state-owned lands and only occur on lands obtained from willing sellers and where consistent with local land use plans. Meeting the Delta Reform Act’s coequal goals will require conveyance improvements and substantial ecosystem restoration, which may be frustrated if local governments could adopt land use plans that prevented these actions or if agencies could not use legislatively-granted powers of eminent domain when needed. Using appropriately

located public lands for ecosystem restoration projects may be desirable for many reasons. However, well-designed adaptive management requires that early stages of restoration programs emphasize pilot scale projects. Existing public lands may not always be the best sites for pilot scale projects, which require smaller sites located where experimentation and monitoring are feasible. The recommendation to require full mitigation of the economic impacts from habitat creation or development of water export facilities is also infeasible. California law requires mitigation of environmental impacts, when feasible, but allows projects to proceed despite adverse effects when there are overriding circumstances and full mitigation is infeasible. No state law requires full mitigation of economic impacts. These two recommendations are opposed by the Natural Resources and Business and Transportation agencies and the Department of Food and Agriculture.

List of Attachments

- Attachment 1: Delta Protection Commission's Proposal to Protect the Delta as an Evolving Place
- Attachment 2: National Heritage Area Feasibility Study
- Attachment 3: Executive Summary -- Economic Sustainability Plan for the Sacramento-San Joaquin Delta
- Attachment 4: Economic Sustainability Plan for the Sacramento-San Joaquin Delta

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Table 1. Recommended Strategies and Actions for Economic Sustainability with DSC Staff Analysis

	Recommended Strategies and Actions for Economic Sustainability	Conformance with Delta Reform Act and Delta Plan Objectives	Staff Notes
Levees and Public Safety Recommendations	1. Improve and maintain all non-project levees to at least the Delta-specific PL 84-99 standard.	Inconsistent	Water Code Sec 85305(a) requires Delta Plan to prioritize levee improvements. Uncertain cost undermines feasibility.
	2. Improve most "lowland" levees and selected other levees to a higher Delta-specific standard that more fully addresses the risks due to earthquakes, extreme floods, and sea-level rise, allows for improved flood fighting and emergency response, provides improved protection for legacy communities, and allows for growth of vegetation on the water side of levees to improve habitat.	Inconsistent	Water Code Sec 85305(a) requires Delta Plan to prioritize levee improvements. Uncertain cost undermines feasibility.
	3. The Delta Levee Subventions and Special Projects Program should continue to be supported.	Consistent	Interim step until levee improvements are prioritized by Delta Plan.
	4. Transfer to a regional agency with fee assessment authority on levee beneficiaries responsibility for allocating funds for the longer-term improvement of Delta levees and the maintenance of regional emergency preparedness, response, and recovery systems developed jointly with the Delta counties and state and federal governments.	Potentially consistent; discussion needed	Further evaluation needed to ascertain responsibilities of Delta Flood Risk Management Assessment District.
	5. In addition to providing funding for longer-term levee improvements, provide ongoing funding for regular levee maintenance and expanded emergency preparedness, response, and recovery.	Inconsistent	Feasibility uncertain without additional cost information; maintenance of non-project levees is local responsibility;

	6. Reduce or eliminate regulatory impediments to action by the creation of a one-stop permitting system for selected activities within the Delta including dredging, levee construction, and ecosystem restoration.	Consistent. Potential role for regional economic sustainability agency or DPC	
	7. Fully and expeditiously implement the recommendations contained in the SB27 Sacramento-San Joaquin Delta Multi-Hazard Coordination Task Force report.	Consistent	Responds to Science Program independent panel's review.
	8. Formally identify the legal Delta as the geographic basis for integrated response, mutual aid, decision making, and information sharing process during major floods.	Consistent	Responds to Science Program independent panel's review.
General Recommendations for Economic Sustainability	1. Designate a regional agency to implement and facilitate economic development efforts.	Consistent	Requires coordination with Delta Conservancy and local agencies.
	2. Economic impacts of habitat creation and development of facilities for export water supply should be fully mitigated.	Infeasible	Exceeds requirements of California law.
	3. Land use planning and regulation must be clear and consistent across agencies.	Potentially consistent	Clarity is desirable, but assuring consistency across agencies may be infeasible in some situations. Base flood elevations should be developed by state agencies and Corps of Engineers to assure consistency.
Recommendations for Economic Sustainability Agriculture	1. Maintain and enhance the value of Delta agriculture.	Inconsistent	Desirable, but may be inconsistent with ecosystem restoration in some locations. Does not reflect potential for change inherent in "evolving place".
	2. Limit the loss of productive farmland to urbanization, habitat, and flooding to the greatest practical extent.	Consistent	Some loss may be unavoidable, but limiting where feasible is desirable. Public lands and lower value agricultural lands are not always appropriately sited for required habitat types.

	3. Protect Delta water quality and water supplies for agriculture.	Consistent	Promotes a more reliable water supply consistent with 85302(d)(1) and improved water quality consistent with 85302(e)(5). The State Water Resources Control Board is responsible for balancing water supply and water quality needs for agriculture and other beneficial uses.
	4. Support growth in agritourism.	Consistent	Recommended by California State Parks and UC Davis.
	5. Support local value-added processing of Delta crops.	Consistent	Recommended by UC Davis. Flood insurance standards would apply to new processing facilities.
Recommendations for Economic Sustainability of Recreation and Tourism	1. Protect and enhance private enterprise-based recreation with support from state and local public agencies.	Consistent	State and local assistance could include technical assistance, regional branding, and identification of appropriate development sites.
	2. Focus recreation development in five location-based concepts.	Consistent	Similar to California State Parks' recommendations.
	3. Implement Economic Sustainability Plan through specific strategies.	Consistent	Strategies appear desirable. Levee improvements for legacy communities and recreation areas depend on Delta Plan's levee prioritization. Consistent planning and regulation is desirable but not always feasible.
Recommendations for Infrastructure	1. Planning of levee investments must fully consider the economic value of infrastructure services along with all other benefits.	Consistent	Economic value of infrastructure services are among values to be considered.
	2. All owners and operators of infrastructure that depend on Delta levees must contribute to levee system investment and maintenance.	Consistent	Consistent with beneficiary pays principle; would require new authority for reclamation districts or flood control agencies. Requires coordination with CalTrans to discuss its authority to contribute.
	3. Protect and improve Delta water quality and supply for agricultural, municipal and industrial uses.	Consistent	Promotes a more reliable water supply consistent with 85302(d)(1) and improved water quality consistent with 85302(e)(5). The State Water Resources Control Board is responsible for balancing water supply and water quality needs for the various beneficial uses.

	4. Ensure that future development of infrastructure in the Delta is aligned with economic sustainability strategies.	Consistent	Potential role for regional economic development agency.
	5. Support expansion and development of the ports.	Consistent	Water-dependent use but requires careful siting and design to avoid adverse environmental effects.
Recommendations for Habitat and Ecosystem Improvements	1. Emphasize strategies with little or no conflict with the Delta economy	Premature	Await BDCP; desirable but must attain ecosystem restoration and water supply reliability goals.
	2. Expanded and enhanced flood bypasses can be consistent with economic sustainability if agencies work with local stakeholders to minimize and mitigate economic impacts.	Consistent	Consultation with stakeholders to avoid or mitigate effects is desirable.
	3. Tidal marsh habitat plans should be significantly reduced	Inconsistent	May preclude attainment of ecosystem and water supply reliability goals. Infeasible because inconsistent with existing biological opinions and best available science.
	4. Increased open-water habitat in the Delta is not recommended.	Inconsistent	Open water habitat may be unavoidable outcome of prioritizing levee improvements.
	5. Include recreation facility development in habitat enhancement plans when possible.	Consistent	Recommended by California State Parks.
	6. Habitat restoration should start on state-owned land and only occur on private lands with willing sellers consistent with local land use plans.	Inconsistent	Suitable restoration sites may not be planned for restoration use by local governments or be available from willing sellers. State lands may not be preferred sites for early restoration actions.
Recommendations for Water Supply Reliability	1. Continuing the through-Delta conveyance is important to economic sustainability in the Delta and can be consistent with water supply reliability within and outside the Delta.	Premature	To be evaluated in BDCP.

	2. Dual conveyance plan with a large, 15,000 cfs isolated conveyance facility has large conflicts with Delta economic sustainability and has high risk for Delta stakeholders.	Premature	To be evaluated in BDCP.
	3. Options to large isolated conveyance must be fully and consistently evaluated.	Consistent	BDCP includes study of alternatives.
Recommendations for Research and Monitoring	1. Conduct a comprehensive and credible cost-benefit analysis to analyze Delta alternatives.	Potentially consistent	Desirable for some but not all Delta projects (e.g., ecosystem restoration).
	2. New recreation data is needed and should be updated regularly.	Consistent	Can measure performance toward recreation and economic objectives; coordinate with California State Parks.
	3. Maintain an Economic Sustainability Scoreboard to track progress.	Consistent	Can provide performance measures to track Economic Sustainability Plan progress.
	4. The Delta Science Program should sponsor more engineering and economic studies in addition to ecological research.	Consistent	Consider in Delta Science Plan.
	5. Increase alignment among the various research and planning initiatives.	Consider in Delta Science Plan	Consider in Delta Science Plan.